16. What is the role of the PRP?

The Board and its current process do not alter existing mechanisms for PRP involvement in the remedy selection process. The current process allows the PRP to work closely with the Agency in conducting the RI/FS, including appropriate, periodic meetings between EPA and the PRPs to ensure that issues such as site characterization, treatability of contaminated media, and the feasibility of different remedial options are fully considered.

When there is a PRP-lead RI/FS, the site manager should notify the PRPs of the pending review **as soon as the region identifies the site as a review candidate**. At this time, the region should offer the PRPs an opportunity to summarize in writing, 20 pages or less*, any technical issues they believe are pertinent to the cleanup decision, including their recommended approach and rationale for that approach. The site manager should attach the PRP's summary to the site information package submitted to the Board four weeks before the meeting. PRP submissions should be made part of the administrative record.

The region, at its discretion, may solicit comments from PRPs who do not conduct the RI/FS. Generally, the region may do this in cases where PRPs have been substantively involved in RI/FS work and/or remedy selection issues, or if the region believes that PRPs may offer technical comments critical to understanding key remedy selection issues at the site.

Note that those groups that have not been working closely with the Agency early in the remedy selection process will still have the opportunity to comment formally on the proposed action during the proposed plan comment period.

PRPs are not involved in any direct discussions with the Board nor are they involved in Board meetings or pre-meeting calls. EPA is responsible for preparation of the Board's review package.

* PRPs may submit up to 40 pages for sites where the estimated remedial action costs exceed $100M.